

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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ROCHELLELY BAEZ,

Plaintiff,

Civil Action.: 14-CV-6621
(AT)(HP)

-against-

ANNE FONTAINE USA, INC, ARI ZLOTKIN and
CINDY D'LUZANSKY,

Defendants.

DECLARATION OF
GREGORY B. REILLY

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I, Gregory B. Reilly, Esq., being duly sworn, deposes and says under the penalties of perjury:

1. I am a member of the law firm of Martin, Clearwater & Bell, LLC, attorneys for Defendants Anne Fontaine USA, Inc., Ari Zlotkin and Cindy D'Luzansky. I am fully familiar with the facts of this case, and I make this declaration in support of Defendants' pending motion for summary judgment.

2. A true and authentic copy of Plaintiff Rochelly Baez's June 17, 2015 deposition transcript is attached to this declaration as **Exhibit 1**.

3. True and authentic copies of exhibits 1 through 18 to Plaintiff Rochelly Baez's June 17, 2015 deposition are attached to this declaration as **Exhibit 2**. Although the deposition transcript references exhibits 19 through 23, these documents were not used at the deposition.

4. A true and authentic copy of Defendant Ari Zlotkin's June 24, 2015 deposition transcript is attached to this declaration as **Exhibit 3**.

5. True and authentic copies of exhibits 1 through 20 to Defendant Ari Zlotkin's June 24, 2015 deposition are attached to this declaration as **Exhibit 4**.

6. A true and authentic copy of Defendant Cindy D'Luzansky's July 21, 2015 deposition transcript is attached to this declaration as **Exhibit 5**.

7. True and authentic copies of exhibits 1 through 31 to Defendant Cindy D'Luzansky's July 21, 2015 deposition are attached to this declaration as **Exhibit 6**.

8. A true and authentic copy of Amanda Blynn's August 6, 2015 deposition transcript is attached to this declaration as **Exhibit 7**.

9. True and authentic copies of exhibits 1 through 9 to Amanda Blynn's August 6, 2015 deposition are attached to this declaration as **Exhibit 8**.

10. A true and authentic copy of Julia Fricke's August 20, 2015 deposition transcript is attached to this declaration as **Exhibit 9**.

11. True and authentic copies of exhibits 1 through 20 to Julia Fricke's August 20, 2015 deposition are attached to this declaration as **Exhibit 10**.

12. A true and authentic copy of Dedra Este's August 5, 2015 deposition transcript is attached to this declaration as **Exhibit 11**.

13. True and authentic copies of exhibits 1 through 5 to Dedra Estes's August 5, 2015 deposition are attached to this declaration as **Exhibit 12**.

14. A true and authentic copy of Linda Niggli's September 17, 2015 deposition transcript is attached to this declaration as **Exhibit 13**.

15. True and authentic copies of exhibits 1, 2, 3, and 5 to Linda Niggli's September 17, 2015 deposition are attached to this declaration as **Exhibit 14**. Exhibit 4 was not marked or used during this deposition.

16. Plaintiff's counsel will be filing a separate declaration attaching true and authentic deposition transcripts of Abigail LaValle and Lisa Battenfield, which we reviewed.

I declare, pursuant to 28 U.S.C. §1746, under the penalty of perjury, that the foregoing is true and correct.

Dated: New York, New York
September 6, 2016

By /s/
Gregory B. Reilly